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SEG&G ROCKY FLATS

EG&G ROCKY FLATS, INC ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

May 28, 1993

93-RF-6683

Mark E Van Der Puy, Director Environmental Protection Division DOE, RFO

PROJECT STATUS REPORT ON POND WATER INTERIM MEASURE/INTERIM REMEDIAL ACTION (IM/IRA), COST ACCOUNT AA18, WORK PACKAGE 12181, MILESTONE 12181052 - DELIVERABLE DUE MAY 28, 1993 - RLB-258-93

This letter is transmitted to the Department of Energy at the Rocky Flats' Office (DOE, RFO) in compliance with the Project Status Report milestone 12181052 requirement

A memorandum was transmitted to Remediation Project Management on May 26, 1993 documenting DOE, RFO response to the rough draft of chapters one through five of the Pond Water IM/IRA delivered to DOE, RFO in compliance with milestone 12181051. The basic content of the subject memo is that the rough draft did not meet agreed upon format and requirements. DOE, RFO does not consider milestone 12181051 completed as a result.

Issues concerning the scope, format, and outline of the Pond Water IM/IRA have been initiated with Gail Hill and Norma Castaneda of DOE, RFO Discussions commenced on May 26, 1993 and will continue on June 2, 1993 A memorandum documenting the understandings reached at the meetings will be sent to DOE, RFO

A revised schedule will be developed based upon the out come of the scope, format and outline meetings. A date for submittal of the revised schedule will be determined upon completion of the meetings

EG&G internal technical reviews of the rough draft were completed on May 26, 1993 Technical editing, that will not be influenced by the scope, format and outline meetings, is being accomplished

Statistical analysis and comparisons of pond water quality data with background water quality data are in progress. Stream water data from Woman Creek and Rock Creek upstream of Rocky Flats Plant is being used for background comparison data due to a lack of on site background pond data. United States Geological Services' (USGS) data for Ralston Reservoir is being investigated as a possible source of background pond data.

A potential Contaminants of Concern (COC) list is scheduled for completion by June 7, 1993 Summary statistics for other parameters not included in the potential COC list will be competed July 16, 1993

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

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Mark E Van Der Puy May 28, 1993 93-RF-6683 Page 2

The EPA informed DOE and EG&G on April 7, 1993 that the new National Pollutant Discharge Elimination System (NPDES) permit for Rocky Flats Plant (RFP) is not a priority and would not be completed this year. A requirement of Environmental Protection Agency (EPA) and Colorado Department of Health (CDH) is that the new NPDES permit and Pond Water IM/IRA undergo concurrent public review. The concurrent public review requirement creates a conflict as to the schedule for completion of the Pond Water IM/IRA. DOE and EG&G need to clarify this conflict with EPA and CDH. There is no regulatory driver for the completion of the Pond Water IM/IRA at this time.

The EG&G Legal Department is conducting an investigation that encompasses determining the most advantageous regulatory program for the operation of the ponds and the legality of making the ponds "Waters of the United States" A draft report on this investigation is due on June 2, 1993

EG&G has been directed by DOE, RFO to investigate water rights technical issues This investigation will be initiated the week of June 7, 1993

Please contact Tye De Mass at extension 8760 if clarification is required

R L. Benedetti

Associate General Manager

Environmental Restoration Management

EG&G Rocky Flats, Inc

TRD II

Ong and 1 cc - M E Van Der Puy

CC

A. H Pauole - DOE, RFO R J Schassburger - DOE, RFO